REMARKS

Applicants appreciate the consideration of the present application afforded by the Examiner. Claims 1-48 are currently pending. Claims 1, 17, 29, and 41 are independent. Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks.

Abstract

The Examiner has objected to the Abstract as exceeding 150 words. Applicants have amended the Abstract such that it no longer exceeds 150 words. Please refer to the attached substitute Abstract. Accordingly, Applicants respectfully request that the objection to the Abstract be withdrawn.

Claim Rejections - 35 U.S.C. §102

Claims 1-48 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Publication No. 2003/0055655 to Suominen ("Suominen"). Applicants submit the Examiner has failed to establish a *prima facie* case of anticipation and traverse the rejection.

In order to establish a *prima facie* case of anticipation under 35 U.S.C. §102, the cited reference must teach or suggest each and every element in the claims. *See M.P.E.P. §2131; M.P.E.P. §706.02.* Accordingly, if the cited reference fails to teach or suggest one or more claimed elements, the rejection is improper and must be withdrawn.

Independent **claim 1** recites, *inter alia*, a method comprising:

receiving electronic ink input;

generating a list of machine-generated text candidates based on the electronic ink input, the list including a first machine-generated text candidate and alternative machine-generated text candidates;

converting the electronic ink input to the first machine-generated text candidate;

displaying the first machine-generated text candidate;

receiving speech input;

converting the speech input to second machine-generated text, wherein ***the second machine-generated text is one of the alternative machine-generated text candidates and the list of machine-generated text candidates functions as a dictionary used for converting the speech input***; and

replacing the first machine-generated text candidate with the second machine-generated text. *(Emphasis added.)*

According to the features of the present invention, electronic ink input is received and a list of machine-generated text candidates is created based on the electronic ink input, said list including a first machine-generated text candidate and alternative machine-generated text candidates. Speech input is then received. This speech input is converted to second machine-generated text, wherein ***the second machine-generated text is one of the alternative machine-generated text candidates and the list of machine-generated text candidates functions as a dictionary used for converting the speech input.*** Applicants submit that Suominen fails to disclose or suggest at least this feature of independent claim 1.

Suominen discloses a text processing system, wherein message recognition of a first type is performed based on a shared language model and a first model specific to the type of message recognition. Then, message recognition of a second type is performed based on both the shared language model and a second specific model. *See Abstract, paragraphs [0124]-[0125].* Suominen discloses correcting misrecognitions by initiating a correction mode and allowing a user to select and edit the misrecognition using editing commands. *See paragraphs [0129]-[0130].* A list of alternative text comparable to the user selection is provided, which is updated based on user-entered character data (i.e., user-selection of specific characters using a character interface). *See paragraphs [0129] and [0133].* However, Suominen does not teach the feature of the present invention wherein speech input is converted to machine-generated text and the second machine-generated text is one of the alternative machine-generated text candidates, and further wherein the list of machine-generated text candidates, determined based on the electronic ink input, functions as a dictionary used for converting the speech input.

In the Office Action, the Examiner relies on paragraph [0172] of Suominen to disclose the above-mentioned feature of independent claim 1, apparently relying on the phrase "text segments chosen from the corpus." No further explanation of the Examiner basis for the rejection is provided. Applicants respectfully disagree that the cited passage, nor Suominen as a whole, disclose the above-mentioned feature of independent claim 1.

Suominen discloses a shared language model including a semantic model. The paragraph in question, [0172], is part of a description of the functioning of a semantic cluster for recognition, beginning roughly at paragraph [0148]. Paragraphs [0160] – [0163] describe different types of semantic clusters, such as ones based on groups of vectors representing text segments and defined based on the number of times the word appears in a particular training document, or "corpus". Other clusters are disclosed as being defined based on the word appearing in context in a corpus, such as articles, paragraphs, headings, etc., or based on the words distance from a reference word. Suominen discloses analyzing each semantic cluster to compute probabilities of shared cluster occurrence. *See paragraph [0164].*

The paragraph relied upon by the Examiner, [0172], discusses the computation of the probability of shared cluster occurrence. Calculating the probability of shared cluster occurrence is not the same as the features of the present invention whereby a list of text candidates based on a first input is used as a dictionary basis for converting a second input to machine-generated text, wherein the second input is converted to one of the text candidates in the list. The text segments of Suominen chosen from the corpus do not correspond to the list of machine-generated text candidates of the present invention, which are generated based upon an electronic ink input. Furthermore, these text segments correspond to a "*random sample*.. of text segments chosen from the corpus." *See paragraph [0172].* Finally, Suominen does not disclose converting a speech input to machine-generated text based on the alleged text segments chosen from the corpus. In the present invention, the speech input is converted to be one of the alternative machine-generated text candidates, and the list of machine-generated text candidates generated based on the electronic ink input functions as a dictionary used for converting the speech input.

Therefore, at least because Suominen fails to teach or suggest each and every claimed element, independent claim 1 is distinguishable from the prior art. Dependent claims 2-16 are also distinguishable from the prior art at least due to their dependence from claim 1, directly or indirectly. Accordingly, Applicant respectfully requests that the rejection of claims 1-16 under 35 U.S.C. § 102(e) be withdrawn.

Independent **claim 17** recites, *inter alia*, a method comprising the step of: converting the speech input to a second machine-generated object, wherein ***the conversion of the speech input is performed based on the list of machine-generated objects*** and wherein ***the second machine-generated object is one of the list of machine-generated objects.***

As discussed above with respect to independent claim 1, Suominen cannot disclose at least the aforementioned features of claim 17. Therefore, at least because Suominen fails to teach or suggest each and every claimed element, independent claim 17 is distinguishable from the prior art. Dependent claims 18-28 are also distinguishable from the prior art at least due to their dependence from claim 17, directly or indirectly. Accordingly, Applicant respectfully requests that the rejection of claims 17-28 under 35 U.S.C. § 102(e) be withdrawn.

Independent **claim 29** recites, *inter alia*, a method comprising the step of: converting the speech input to a second machine-generated object, wherein ***the conversion of the speech input is performed based on the list of machine-generated objects*** and wherein ***the second machine-generated object is one of the list of machine-generated objects.***

As discussed above with respect to independent claim 1, Suominen cannot disclose at least the features wherein the second machine-generated object is one of the list of machine-generated objects. Therefore, at least because Suominen fails to teach or suggest each and every claimed element, independent claim 17 is distinguishable from the prior art. Dependent claims 18-28 are also distinguishable from the prior art at least due to their dependence from claim 17, directly or indirectly. Accordingly, Applicant respectfully requests that the rejection of claims 17-28 under 35 U.S.C. § 102(e) be withdrawn.

Independent claim 29 recites, *inter alia*, a system comprising: a second input adapted to receive speech input and a processor programmed and adapted to ***generate a list of machine-generated text candidates based on the electronic ink input, the list including a first machine-generated text candidate and alternative machine-generated text candidates and functioning as a dictionary for converting the speech input.***

As discussed above with respect to independent claim 1, Suominen cannot disclose at least the features whereby the list of machine-generated text candidates functions as a dictionary for converting the speech input. Therefore, at least because Suominen fails to teach or suggest each and every claimed element, independent claim 29 is distinguishable from the prior art. Dependent claims 30-40 are also distinguishable from the prior art at least due to their dependence from claim 29, directly or indirectly. Accordingly, Applicant respectfully requests that the rejection of claims 30-40 under 35 U.S.C. § 102(e) be withdrawn.

Independent **claim 41** recites, *inter alia*, a system comprising a processor programmed and adapted to (c) generate a list of machine-generated objects based on the electronic ink input, the list including the first machine-generated object and alternative machine-generated objects; (d) convert the speech input to a second machine-generated object using speech recognition, ***wherein the conversion of the speech input is performed based on the list of machine-generated objects and wherein the second machine-generated object is one of the list of machine-generated objects.***

As discussed above with respect to independent claim 1, Suominen cannot disclose at least the features wherein the second machine-generated object is one of the list of machine-generated objects. Therefore, at least because Suominen fails to teach or suggest each and every claimed element, independent claim 41 is distinguishable from the prior art. Dependent claims 42-48 are also distinguishable from the prior art at least due to their dependence from claim 41, directly or indirectly. Accordingly, Applicant respectfully requests that the rejection of claims 41-48 under 35 U.S.C. § 102(e) be withdrawn.

CONCLUSION

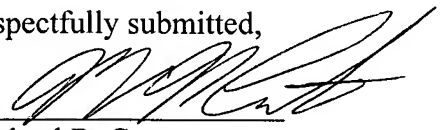
All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Notice of same is earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John R. Sanders, Reg. No. 60,166 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

Dated: August 2, 2007

Respectfully submitted,

By 

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